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November 12, 2013

VIA ELECTRONIC FILING

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Phoenix Beverages, Inc., et al. v. Exxon Mobil Corporation, et al.
Case No.: 1:12-cv-03771-PKC-JO

Dear Judge Chen:

This firm represents Third-Party Defendant, Waste Management of Maryland, Inc. ("WMM"), in the above-captioned matter. WMM respectfully joins in and incorporates by reference the motion of other third-party defendants, filed November 8, 2013 (Docket No. 238) and granted on November 12, 2013, that the answers to cross-claims be stayed until all third-party defendants have answered the third-party complaints and a conference is scheduled to address the case management order for the third-party action.

We appreciate the Court's consideration of this matter.

Respectfully submitted,

/s/ Sharon Oras Morgan

Sharon Oras Morgan
Counsel for Waste Management of Maryland, Inc.

cc: Counsel of Record (via ECF)

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